

*Constantine verifies exclusive Kaiser dealings in defense of Eufora litigations...*

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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

**THEODORE R. HUGHES, ETHEL  
KAISER, NICK PRIVITELLO, ROBERT J.  
RIZZI,**

**Plaintiffs,**

**v.**

**TOMMY CONSTANTINE,**

**Defendant.**

**CASE NO. CV11-2692-SJF-WDW**

**DECLARATION OF TOMMY  
CONSTANTINE IN SUPPORT OF  
THE RESPONSE AND OPPOSITION  
TO PLAINTIFFS' REQUEST FOR  
PRELIMINARY INJUNCTION**

Defendant Tommy Constantine, being duly sworn, upon oath, deposes, and says as follows:

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29. During all negotiations prior to the Plaintiffs transmitting their money, I dealt exclusively with John Kaiser.